UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

| UNITED STATES OF AMERICA, |) Criminal No. |
|---------------------------|----------------|
| |) 04-10098-WG |
| v. |) |
| |) |
| CARMEN FIGUEROA, |) |
| |) |
| Defendant |) |

UNITED STATES' MOTION FOR EXTENSION OF TIME TO FILE ITS RESPONSE TO DEFENDANT FIGUEROA'S MOTION FOR NEW TRIAL

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves the Court for an order extending the time in which to file a response to defendant Figueroa's motion for a new trial.

In order to respond to the defendant's motion, the government needs transcripts of the trial testimony. The transcripts have been ordered, but have not yet been received. Accordingly, the government seeks an additional three week period until September 14, 2005, in which to file its brief.

MICHAEL J. SULLIVAN United States Attorney

By: /s/ Susan M. Poswistilo
SUSAN M. POSWISTILO
Assistant U.S. Attorney